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*Proposed Attorneys for Debtors  
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:

MODELL'S SPORTING GOODS, INC., *et al.*,  
Debtors.<sup>1</sup>

Chapter 11

Case No. 20-14179 (VFP)

Jointly Administered

**NOTICE OF DEBTORS' INTENT TO SEEK A FURTHER SUSPENSION OF THEIR  
CHAPTER 11 CASES THROUGH AND INCLUDING MAY 31, 2020**

**PLEASE TAKE NOTICE** that, on March 27, 2020 this Court entered that certain *Order  
Temporarily Suspending the Debtors' Chapter 11 Cases Pursuant to 11 U.S.C. §§ 105 and 305*  
[Docket No. 166] (the "**Suspension Order**") suspending these chapter 11 cases through and

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<sup>1</sup> The Debtors in these chapter 11 cases and the last four digits of each Debtor's federal tax identification number, as applicable, are as follows: Modell's Sporting Goods, Inc. (9418), Modell's II, Inc. (9422), Modell's NY II, Inc. (9434), Modell's NJ II, Inc. (9438), Modell's PA II, Inc. (9426), Modell's Maryland II, Inc. (9437), Modell's VA II, Inc. (9428), Modell's DE II, Inc. (9423), Modell's DC II, Inc. (9417), Modell's CT II, Inc. (7556), MSG Licensing, Inc. (8971), Modell's NH, Inc. (4219), Modell's Massachusetts, Inc. (6965) and Modell's Online, Inc. (2893). The Debtors' corporate headquarters is located at 498 Seventh Avenue, 20<sup>th</sup> Floor, New York, New York 10018.

including April 30, 2020, without prejudice to the Debtors' right to seek a further extension of time.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the Suspension Order, and in light of the fact that various state and local orders aimed at minimizing infections and deaths from the novel coronavirus known as COVID-19 continue to prevent the Debtors from conducting retail sales at their various locations, the Debtors submit this notice (the "**Extension Notice**") of their intent to seek a further suspension of these chapter 11 cases through and including May 31, 2020, without prejudice to the Debtors' right to seek additional time.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the Suspension Order, objections to the relief requested in this Extension Notice must be filed with the Court on or before **April 24, 2020 at 5:00 p.m. (ET)**.

**PLEASE TAKE FURTHER NOTICE** that a telephonic hearing (the "**Hearing**") on the relief requested in this Extension Notice shall be held on **April 30, 2020 at 10:00 a.m. (ET)** before the Honorable Vincent F. Papalia, United States Bankruptcy Judge.

**PLEASE TAKE FURTHER NOTICE** that parties may consult the website for the United States Bankruptcy Court for the District of New Jersey, <http://www.njb.uscourts.gov/>, for instructions on how to participate in the Hearing.

**PLEASE TAKE FURTHER NOTICE** that parties wishing to participate in the Hearing must contact CourtSolutions to schedule an appearance no less than twenty-four hours before the Hearing.

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Dated: April 20, 2020

Respectfully submitted,

**COLE SCHOTZ P.C.**

*Proposed Attorneys for Debtors  
and Debtors in Possession*

By: /s/ Michael D. Sirota

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